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Attorneys for defendant
DAVID CAMPOY

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,)	No. CR 20-0458 BLF
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER CONTINUING STATUS
vs.)	CONFERENCE DATE FROM
)	OCTOBER 19, 2021 TO DECEMBER
DAVID CAMPOY, et al)	7, 2021
)	
)	
Defendants.)	
)	
)	

1. This matter is set for a status hearing on October 19, 2021 at 9:15 AM. The 23-count Second Superseding Indictment charges fifteen defendants with a variety of drug trafficking and firearms offenses. The case involves a substantial volume of discovery, including multiple wiretaps.

2. The government has been producing discovery on a rolling basis. A substantial production was made to the joint discovery coordinator and that material was made available to defense counsel on September 21. The government has indicated that an additional production, consisting of video surveillance footage, will be forthcoming shortly. A continuance will allow the parties time to review the substantial volume of discovery.

3. Counsel for the government, Ms. Shepard, is continuing to recover from surgery. She is hoping to return to work by December 2021.

4. The parties stipulate that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial, given the need for effective preparation of counsel.

For the above reasons, the parties respectfully request that the date of October 19, 2021 be vacated, and that the matter be re-set for a status conference on December 7, 2021.

IT IS SO STIPULATED.

DATED:

_____/s/_____
ALEXANDRA SHEPARD
Assistant United States Attorney

DATED

_____/s/_____
Peter A. Leeming
Attorneys for David Campoy

DATED:

_____/s/_____
EDWARD AJLOUNY
Counsel for Defendant Jose Campoy

DATED:

_____/s/_____
DOUGLAS RAPPAPORT
Counsel for Defendant David Greenman

1
2 DATED: _____/s/_____
3 SEVERA KEITH
4 Counsel for Defendant Kimberly Carrasco

5 DATED: _____/s/_____
6 DAVID PLOTSKY
7 Counsel for Defendant Miguel Carrizal
8 Zamora

9 DATED: _____/s/_____
10 RICHARD WEESE,
11 Counsel for Defendant Jose Rodriguez
12 Naranjo

13 DATED: _____/s/_____
14 NAOMI CHUNG
15 Counsel for Defendant Nicholas Ardanuy

16 DATED: _____/s/_____
17 JERRY FONG
18 Counsel for Defendant Ignacio Espinoza

19 DATED: _____/s/_____
20 ROBERT CAREY
21 Counsel for Defendant Juan Johel Padilla

22 DATED: _____/s/_____
23 ALFREDO MORALES
24 Counsel for Defendant Luis Sendino

25 DATED: _____/s/_____
ROBERT LYONS
Counsel for Defendant Michael Osuna
Guizar

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID CAMPOY, et al,

Defendants.

) No. 20 CR-0458 BLF
)
) ~~[PROPOSED]~~ ORDER
) CONTINUING STATUS
) CONFERENCE DATE
)
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The time between October 19, 2020 and December 7, 2020 is excluded from the Speedy Trial Act due to the need for defense investigation and effective preparation of counsel. Furthermore, the Court finds that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial. The Court therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Dated: October 6, 2021

Stipulation and ~~Proposed~~ Order 20 CR-0458- 4